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5 **UNITED STATES DISTRICT COURT**
6 **DISTRICT OF NEVADA**
7

8 UNITED STATES OF AMERICA,)
9 Plaintiff,) 2:10-cr-00547-RLH-RJJ
10 vs.) MOTION TO DISMISS COMPLAINT
11) AS TO KATHLEEN HALEY ONLY
12 FRANKIE DUPUIS, et. al.,)
13 Defendant.)
13 _____

14 COMES NOW, the United States of America by and through DANIEL G. BOGDEN, United
15 States Attorney, and PATRICK WALSH, Assistant United States Attorney, and files this Motion to
16 dismiss the complaint as to Kathleen Haley and strike all references to that name.

17 On October 29, 2010, a complaint was filed under case number 2:10-mj-00846-PAL-PAL
18 alleging conspiracy to commit money laundering and conspiracy to distribute a controlled substance
19 (oxycodone) against nineteen (19) individuals. One of the individuals was incorrectly identified as
20 Kathleen Haley. The true name of the defendant is Cathleen Renney. Ms. Renney was arrested and
21 made her initial appearance in the District of Alaska.

22 At Ms. Renney's initial appearance, the government stated on the record that it intended to
23 accuse Ms. Renney, who was incorrectly identified as Ms. Kathleen Haley.

24 On November 9, 2010, a federal Grand Jury sitting in Las Vegas, Nevada returned a two
25 count indictment against twenty-seven (27) defendants in this case. That indictment correctly
26 identified Ms. Renney as the person accused of criminal conduct.

1 There is a person in Alaska named Kathleen Haley. The true Ms. Haley is not a subject of
2 this investigation and has not been accused of criminal conduct.

3 In order to clear the record, the government moves to dismiss the complaint against Kathleen
4 Haley and strike all reference to that name. The Government will continue to prosecute Ms. Renney
5 through the indictment returned in her true name.

6 WHEREFORE, based on the foregoing, the United States moves to dismiss the complaint
7 against Kathleen Haley only and strike all reference to her name.

8
9 DATED this 19th day of November, 2010.

10 Respectfully submitted,

11 DANIEL G. BOGDEN
United States Attorney

12 /s/ Patrick Walsh

13 PATRICK WALSH
14 Assistant United States Attorney

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16
17 **IT IS SO ORDERED:**

18 
19 Robert J. Johnston
UNITED STATES MAGISTRATE JUDGE

20 Dated 12/3/10